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11 Attorney for Petitioner United States of America

12 IN THE UNITED STATES DISTRICT COURT
13
FOR THE NORTHERN DISTRICT OF CALIFORNIA
14
SAN FRANCISCO DIVISION

15
16 UNITED STATES,

17 Plaintiff,
18 v.

19 BABAK BROUMAND AND
20 MALAMATENIA MAVROMATIS,

21 Defendants.
22

Case No.CR-21-00162-WHO

**ORDER TO CONTINUE STATUS
CONFERENCE FROM JUNE 29, 2023
AT 1:30 PM TO AUGUST 10, 2023
UNDER THE SPEEDY TRIAL ACT**

23
24 STIPULATION

25 The parties hereby stipulate that the currently set status conference be continued from
26 June 29, 2023, at 1:30 p.m. to July 27, 2023, at 1:30 p.m. Defendant BABAK BROUMAND
27 is in custody in the Central District of California, serving a 72-month sentence, after being
28

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1 convicted at jury trial in *United States v. Broumand*, 20-224-RGK(A). Defendant
2 MALAMANTENIA MAVROMATIS is not in custody.

3 1. Defendant BABAK BROUMAND is in custody in the Central District of
4 California after being convicted at jury trial in the related case of *United States v. Broumand*,
5 20-224-RGK(A).

6 2. Additionally, counsel for defendant MALAMANTENIA MAVROMATIS is
7 currently engaged in a state jury trial in Marin County Superior Court, *People v. Hector*
8 *Gramajo-Diaz*, Case No.: CR209142A.

9 3. The government has produced over 60,000 pages of discovery to defendant
10 MAVROMATIS, which primarily consists of business records, including bank, credit card,
11 mortgage broker, title company, and escrow company records, tax returns, and witness
12 interview reports.

13 4. On March 24, 2022, the government obtained a superseding indictment in this case
14 adding defendant MAVROMATIS, who first appeared in this case on April 19, 2022, in
15 which she was charged with two counts of False Statements on a Loan Application in
16 violation of 18 U.S.C. § 1014 (Counts Four and Six). Prior to defendant MAVROMATIS's
17 indictment, co-defendant BABAK BROUMAND had already been charged.

18 5. Additionally, counsel for both defendants agree that additional time is needed for
19 meaningful preparation for trial, including additional research and investigation, and
20 discussions with their clients and the government regarding possible pretrial resolution. The
21 parties are currently engaged in earnest pretrial resolution discussion that may obviate the need
22 for trial.

1 6. The government and counsel for the defendants agree that time be excluded under
2 the Speedy Trial Act so that defense counsels can continue to prepare for trial and engage in
3 pretrial resolution discussions.
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5 7. The parties stipulate and agree that excluding time until July 27, 2023, will allow
6 for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further
7 stipulate and agree that the ends of justice served by excluding the time from June 29, 2023,
8 through July 27, 2023, from computation under the Speedy Trial Act outweigh the best
9 interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

10 8. The parties are also discussing resolution of this entire matter and require more time
11 to discuss different settlement alternatives.
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9. The undersigned Assistant United States Attorneys certify that they have obtained approval from all counsel to file this stipulation and proposed order.

IT IS SO STIPULATED.

DATED: June 27, 2023

/s/ Michael J. Morse
MICHAEL J. MORSE
JUAN M. RODRIGUEZ
Special Assistant United States Attorney

DATED: June 27, 2023

/s/ Steven F. Gruel
STEVEN F. GRUEL
Counsel for Defendant BROUMAND

DATED: June 27, 2023

/s/ Paul H. Nathan
PAUL H. NATHAN
Counsel for Defendant MAVROMATIS

ORDER

Based upon the facts set forth in the stipulation of the parties and for good cause shown, the Court hereby continues the status conference from June 29, 2023, at 1:30 p.m. to August 10, 2023, at 1:30 p.m.

Furthermore, the Court finds that failing to exclude the time from June 29, 2023, through August 10, 2023, would unreasonably deny defense counsel and the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv).

The Court further finds that the ends of justice served by excluding the time from

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1 June 29, 2023, through August 10, 2023, from computation under the Speedy Trial Act
2 outweigh the best interests of the public and the defendants in a speedy trial. Therefore,
3 and with the consent of the parties,

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5 IT IS HEREBY ORDERED that the time from June 29. 2023, through August 10,
6 2023, shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)
7 (7)(A), (B)(iv).

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9 IT IS SO ORDERED.

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11 DATED: June 29, 2023

12 HONORABLE WILLIAM H. ORRICK
13 United States District Court